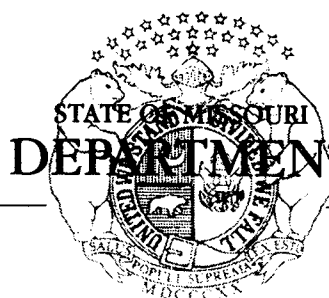


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MAY 21 1997



Mel Carnahan, Governor • David A. Shorr, Director

RCRA PERMITTING & COMPLIANCE BRANCH
(RPCB)

DEPARTMENT OF NATURAL RESOURCES

Kansas City Regional Office
3800 S. Elizabeth Avenue, Suite G
Independence, MO 64057-2652
(816)795-8655
FAX (816)795-8755

March 17, 1997

CERTIFIED MAIL P 909 174 858
RETURN RECEIPT REQUESTED

RECEIVED

MAR 24 1997

HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

Mr. Stan Broski, Jr.
Chairman
Broski Brothers, Inc.
6400 East 35th Street
Suite 200
Kansas City, MO 64129

Dear Mr. Broski:

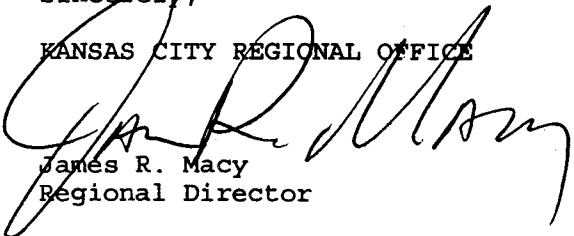
Enclosed is a copy of the Resource Conservation and Recovery Act compliance evaluation inspection report for Broski Brothers, Inc., located in Jackson County, Missouri. The report is based on the March 11, 1997, inspection and is believed to be self-explanatory.

Within 30 days of receipt of this letter, Broski Brothers, Inc. should provide the information requested in Comment number two and four, along with any supporting documentation to our office at the letterhead address. A copy of your response must also be submitted to Ms. Kathy Flippin, Chief, Hazardous Waste Enforcement Unit, P.O. Box 176, Jefferson City, Missouri 65102.

Should you have any questions, please contact Denise Beck of my staff at (816) 554-4100. The Missouri Department of Natural Resources (MDNR) is appreciative of your cooperation.

Sincerely,

KANSAS CITY REGIONAL OFFICE


James R. Macy
Regional Director

JRM/dbj

Enclosures

c: Ms. Kathy Flippin, Hazardous Waste Program

3669.3222 Jackson County
Broski Brothers, Inc.

H:\DMB\BROSKI.971



R00060560
RCRA Records Center

MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT
MARCH 17, 1997

RECEIVED
MAR 24 1997

HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

FACILITY

Broski Brothers, Inc.
39th and Belmont
Kansas City, MO 64129

EPA ID: MOT300010972
MO Generator ID: 001107

(816) 861-8000

PARTICIPANTS

Department of Natural Resources:

Ms. Denise M. Beck
Environmental Specialist
Kansas City Regional Office

Ms. Caroline N. Wainaina
Environmental Specialist
Kansas City Regional Office

Broski Brothers, Inc.:

Mr. Stan Broski
Chairman

INTRODUCTION

A hazardous waste compliance evaluation inspection was conducted at Broski Brothers, Inc. on March 11, 1997. The purpose of this inspection was to assess the facility's compliance with the Missouri Hazardous Waste Management Law, the Federal Resource Conservation and Recovery Act, and the state and federal hazardous waste management regulations. The scope of the inspection was confined to aspects of facility operations pertaining to hazardous waste management. The inspection was conducted under authority granted to the department by sections 260.375(9) and 260.377 RSMo. The facility was evaluated as hazardous waste land disposal facility.

FACILITY DESCRIPTION

The Broski Brothers, Inc. facility located at 39th and Belmont is a former surface impoundment utilized for the treatment and storage of spent pickle liquor (K062). The spent pickle liquor was generated from descaling operations at All Brite Galvanizing located at 7700 East 12th Street and Broski Brothers' facility at 3915 Fuller both in Kansas City, Missouri. The surface impoundment was approximately 140 feet by 310 feet and had a capacity of one million gallons. The surface impoundment was operated from approximately 1977 to November of 1985. In 1986, spent pickle liquor, except from steel finishing operations of facilities within the iron and steel industry, was removed as a listed hazardous waste. The spent pickle liquor was still a characteristically corrosive hazardous waste (D002).

Closure activities for the former surface impoundment was initiated in early 1986 and physical closure of the surface impoundment was completed in 1988. During the closure of the surface impoundment, the waste was neutralized, an impermeable cap was put into place and final vegetative cover was established. In a letter dated June 6, 1996, the department approved a closure plan

modification to remediate the release plume from the western edge of the impoundment. The release plume is believed to have resulted from a rodent burrow that breached the west dike of the surface impoundment. Remediation of the release plume was conducted in August of 1996. Currently, the department is reviewing the hazardous waste post-closure permit for the surface impoundment.

At the time of the inspection no RCRA regulated wastes were being generated or accepted by the facility.

UNSATISFACTORY FEATURES

None

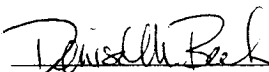
COMMENTS

1. Broski Brothers needs to have the following records on-site and readily available for review during hazardous waste compliance evaluation inspections. This is not a complete list and other records maybe requested at the time of the inspection.
 - a. Hazardous waste manifests documenting shipment of hazardous waste off-site in the last three years.
 - b. An inspection log and written schedule for inspecting the closed surface impoundment.
 - c. Personnel training plan which specifies job title, description and name of person filling the position, duties of the position as it relates to hazardous waste management of the closed surface impoundment, written record of the type and amount of training given and documentation confirming that the training has been given. Training must be reviewed on an annual basis. Training for personnel should include training on Broski Brothers' contingency plan as well.
 - d. Broski Brothers' current contingency plan.
 - e. Groundwater sampling and analysis plan.
 - f. Groundwater monitoring results.
 - g. Post-Closure Plan for the facility.
 - h. Most current post-closure cost estimate for the facility.
2. At the time of the inspection, it was discovered that Broski Brothers has abandoned several of the groundwater monitoring wells at the facility. Broski Brothers should provide the Kansas City Regional Office with a list of the active monitoring wells on-site, as well as a list of monitoring wells that have been abandoned and when the wells were abandoned.
3. At the time of the inspection, the inspectors observed two new groundwater monitoring wells located on the west side of the facility. The monitoring wells were not identified with unique ID numbers. Broski Brothers should mark the wells in a manner that ensures easy identification of the wells. (See Attachment 1, photograph numbers two and three for supporting documentation).
4. At the time of the inspection, the inspectors observed two 55-gallon drums located near the groundwater monitoring wells identified in comment number three. The drums were not labeled as to their contents. The department

Report of Inspection
Broski Brothers, Inc.
March 17, 1997
Page 3

is requesting that Broski Brothers determine the contents of the drums. Should the material be determined to be a waste, how the waste was generated, an approximate date of when the waste was generated, if the waste is a hazardous waste and Broski Brothers' plans for disposal of the waste. (See Attachment 1, photograph number one for supporting documentation).

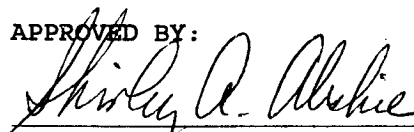
REPORTED BY:


Denise M. Beck
Environmental Specialist

SAA/dbj

Attachment 1 - Photographs

APPROVED BY:


Shirley A. Abshier
Unit Chief
Hazardous Waste Program